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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

Case No. 3:23-MD-3084-CRB

**STIPULATION REGARDING SEALING  
 MATERIALS PRODUCED ON JANUARY 16,  
 2024 PURSUANT TO JANUARY 9, 2024  
 ORDER**

This Document Relates to:  
 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
 Courtroom: G – 15th Floor

*(Filed Concurrently with Administrative Motion  
 to Seal Materials, Notice of Lodging of  
 Materials, Declaration of Randall S. Luskey,  
 and [Proposed] Order)*

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**STIPULATION**

**WHEREAS**, on January 9, 2024, the Court granted in part and denied in part Plaintiffs' Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information ("January 9 Order");

**WHEREAS**, on January 16, 2024, Uber produced to Plaintiffs the letter and charts included in Exhibit A to Uber's Notice of Lodging of Materials Produced on January 16, 2024 pursuant to the Court's January 9, 2024 Order ("Exhibit A");

**WHEREAS**, on January 19, 2024, this Court held a Case Management Conference at which Uber proposed making an "under seal submission" of the Exhibit A materials to Magistrate Judge Cisneros, Tr. 34:17-24;

**WHEREAS**, Magistrate Judge Cisneros agreed and instructed Uber to submit the Exhibit A materials "under seal," Tr. 35:4-5, 14-17; and

**WHEREAS**, Counsel for Plaintiffs expressed that she had "no concerns" about Uber's filing the Exhibit A materials under seal, Tr. 35:2-3.

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

The materials filed as Exhibit A to Uber's Notice of Lodging of Materials Produced on January 16, 2024 pursuant to the Court's January 9, 2024 Order be filed under seal.

**IT IS SO STIPULATED.**

1 Dated: January 23, 2024

**PAUL, WEISS, RIFKIND, WHARTON &  
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2 By: /s/ Randall S. Luskey

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9 Dated: January 23, 2024

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**FILER'S ATTESTATION**

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 23, 2024

By: /s/ Randall S. Luskey  
Randall S. Luskey